

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IRENE SIMMONS AND RODELL	)	
SANDERS, for themselves and others	)	Case No. 1:20-CV-1128
similarly situated,	)	
	)	
Plaintiffs,	)	Judge John J. Tharp Jr.
	)	
v.	)	Magistrate Judge Jeannice W. Appenteng
	)	
MOTOROLA SOLUTIONS, INC., and	)	
VIGILANT SOLUTIONS, LLC,	)	
	)	
Defendants.	)	

**JOINT STATUS REPORT**

Under the Court's November 1, 2024 Minute Entry (Dkt. 167), Plaintiffs Irene Simmons and Rodell Sanders and Defendants Motorola Solutions, Inc. and Vigilant Solutions, LLC, through their respective counsel, respectfully submit this joint status report.

Since their last status report, the Parties have circulated a final settlement agreement for execution. Relatedly, the Parties have chosen a claims administrator to move forward on after completing discussions on how to address notice and possible fraudulent claims issues. Upon execution of the final Settlement Agreement, Plaintiffs will promptly move for preliminary approval of the Settlement Agreement in the pending state case in Cook County Circuit Court, *Simmons v. Motorola Solutions, Inc.*, 2024L010142 (Cook Cnty. Cir. Ct.).

Therefore, the Parties respectfully request that the Court continue to stay ruling on Defendants' pending motion for summary judgment (Dkt. 111) and schedule a due date for another status report in 30 days.

[Signature Page follows]

DATED: December 4, 2024

PLAINTIFFS IRENE SIMMONS and  
RODELL SANDERS

/s/ Michael I. Kanovitz  
One of their attorneys

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Respectfully submitted,

DEFENDANTS MOTOROLA SOLUTIONS,  
INC. and VIGILANT SOLUTIONS, LLC

/s/ David C. Layden  
One of their attorneys

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